

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CHARLES RICHARD HAILE, JR.,	:	Civil Action No. 1:16-cv-08661-VEC
Individually and on Behalf of All Others	:	
Similarly Situated,	:	<u>CLASS ACTION</u>
	:	
Plaintiff,	:	
	:	
vs.	:	
	:	
ALLERGAN PLC, BRENTON L.	:	
SAUNDERS, PAUL M. BISARO, MARIA	:	
TERESA HILADO, and R. TODD JOYCE,	:	
	:	
Defendants.	:	
_____	X	

_____	X	
DAVID ROSENBERG, Individually and on	:	Civil Action No. 1:17-cv-00025
Behalf of All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
Plaintiff,	:	
	:	
vs.	:	
	:	
ALLERGAN PLC (f/k/a ACTAVIS PLC),	:	
BRENTON L. SAUNDERS, PAUL M.	:	
BISARO, MARIA TERESA HILADO and	:	
ROBERT TODD JOYCE,	:	
	:	
Defendants.	:	
_____	X	

**NOTICE OF MOTION AND MOTION FOR CONSOLIDATION,  
APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF LEAD PLAINTIFF'S  
SELECTION OF LEAD COUNSEL**

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that proposed lead plaintiff, Strathclyde Pension Fund (the “Pension Fund”), will move this Court, on a date and time as may be designated by the Court, at the Thurgood Marshall U.S. Courthouse, 40 Foley Square, New York, NY 10007, for an order pursuant to the Private Securities Litigation Reform Act of 1995, 15 U.S.C. §78u-4(a)(3)(B), consolidating the above-captioned actions pursuant to Rule 42(a) of the Federal Rules of Civil Procedure, appointing the Pension Fund as lead plaintiff and approving the Pension Fund’s selection of Robbins Geller Rudman & Dowd LLP as lead counsel. In support of this motion, the Pension Fund submits the accompanying Memorandum of Law, Declaration of David A. Rosenfeld and a [Proposed] Order.

DATED: January 3, 2017

ROBBINS GELLER RUDMAN  
& DOWD LLP  
SAMUEL H. RUDMAN  
DAVID A. ROSENFELD

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s/ David A. Rosenfeld  
DAVID A. ROSENFELD

58 South Service Road, Suite 200  
Melville, NY 11747  
Telephone: 631/367-7100  
631/367-1173 (fax)

ROBBINS GELLER RUDMAN  
& DOWD LLP  
DANIELLE S. MYERS  
655 West Broadway, Suite 1900  
San Diego, CA 92101-8498  
Telephone: 619/231-1058  
619/231-7423 (fax)

[Proposed] Lead Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on January 3, 2017, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 3, 2017.

s/ David A. Rosenfeld

DAVID A. ROSENFELD

ROBBINS GELLER RUDMAN

& DOWD LLP

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Melville, NY 11747

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## **Mailing Information for a Case 1:16-cv-08661-VEC Haile, Jr. v. Allergan plc et al**

### **Electronic Mail Notice List**

The following are those who are currently on the list to receive e-mail notices for this case.

- **Joseph Alexander Hood , II**  
ahood@pomlaw.com,abarbosa@pomlaw.com
- **Jeremy Alan Lieberman**  
jalieberman@pomlaw.com,disaacson@pomlaw.com,abarbosa@pomlaw.com

### **Manual Notice List**

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)

## **Mailing Information for a Case 1:17-cv-00025 Rosenberg v. Allergan PLC (f/k/a Actavis PLC) et al**

### **Electronic Mail Notice List**

The following are those who are currently on the list to receive e-mail notices for this case.

- **Amalgamated Bank, as Trustee for the Longview Collective Investment Fund**  
bhart@lowey.com
- **Jack Gerald Fruchter**  
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- **Barbara J. Hart**  
bhart@lowey.com
- **Cassandra Lynn Porsch**  
CPorsch@aftlaw.com

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